

**JOINT AT&T AND SWBT STATUS REPORT ON NEW ELECTRONIC INTERFACES  
FOR PRE-ORDER AND ORDERING AND PROVISIONING FUNCTIONS FOR RESALE SERVICES AND UNE**

<b>FUNCTION (from AT&amp;T Exhibit 15A)</b>	<b>SWBT AVAILABILITY (from AT&amp;T Exhibit 15A)†</b>	<b>SWBT STATUS REPORT AS OF FEBRUARY 28, 1997</b>	<b>AT&amp;T Agreement that Development Issues are Closed<sup>A, B</sup></b>	<b>AT&amp;T COMMENTS AND VIEW OF IMPLEMENTATION DEPENDENCIES AS OF FEBRUARY 28, 1997</b>
				<b>RESALE</b>
<b>PRE-ORDER</b>				
Address Verification	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1</sup>	Yes Prior to 1/1/97	AT&T and SWBT have reached agreement in these areas and AT&T believes that SWBT's Datagate interface is available. AT&T and SWBT established the physical connectivity (T1.5) to be used for testing on 2/24/97. AT&T will work with SWBT to test these transactions. Full interface functionality will not be tested until ordering interfaces and functionality are available.
Service/Features Availability	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1</sup>		
Telephone Number Assignment	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1</sup>		
Dispatch Schedule	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1</sup>		
Due Date	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1</sup>		
Customer Service Record (CSR)	1/1/97C	Development of this functionality is complete for non-complex services. SWBT internal testing completed. Ready for testing by LSPs. <sup>1</sup> Complex CSR functionality will be complete by 4/15/97.	Under Analysis	

<b>POTS ORDERING &amp; PROVISIONING<sup>c</sup></b>				
Migration (Convert Customer As Is)	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1, 2, 3</sup> S&E recap must be supplied by LSP.	Yes 2/6/97	AT&T and SWBT reached agreement on a resolution to SWBT's account structure on 2/6/97. Systems coding and development necessary to implement the migration capabilities for customers with one or multiple lines can begin once other development issues are resolved. Resolution Summary: SWBT will accept a single service order request with multiple lines provided all lines have the same due date. AT&T agreed to methodologies to provide: 1) separate requests for any lines with differing due dates and 2) a "Bill-on" indicator for multiple line orders as requested by SWBT (reference SWBT footnote 2).
Migration With Changes (Convert with changes)	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1, 2, 3</sup> S&E recap must be supplied by LSP.	Yes 2/6/97	AT&T and SWBT reached agreement on a resolution to SWBT's account structure on 2/6/97. Systems coding and development necessary to implement the migration capabilities for customers with one or multiple lines can begin once other development issues are resolved. Resolution Summary: SWBT will accept a single service order request with multiple lines provided all lines have the same due date. AT&T agreed to methodologies to provide: 1) separate requests for any lines with differing due dates and 2) a "Bill-on" indicator for multiple line orders as requested by SWBT (reference SWBT footnote 2).
- Add/Disc Class Features	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1, 2, 3</sup> S&E recap must be supplied by LSP.	Yes 2/3/97	Pending OBF feature code finalization, AT&T will use SWBT's USOCs and FIDs. AT&T and SWBT are prioritizing which of the approximately 1,200 USOCs require mapping prior to implementation.
- Add/Disc Blocking (1+, 0+, 011)	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1, 2, 3</sup> S&E recap must be supplied by LSP.	Yes 2/6/97	Status is the same as migration.

- PIC and PIC Freeze	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,2,3</sup> S&E recap must be supplied by LSP.	Yes 2/6/97	Status is the same as migration.
- Add/Disc Essential Lines	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,2,3</sup> S&E recap must be supplied by LSP.	Yes 2/6/97	Status is the same as migration.
- Add/Disc Additional Lines	1/1/97C	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,2,3</sup> S&E recap must be supplied by LSP.	Yes 2/6/97	Status is the same as migration.
- Directory Listing Changes	2/1/97C	Development of this functionality for straight line listings is complete. SWBT ready for internal testing for straight line listings. <sup>2</sup> EDI mappings for non-straight line listings have not been defined.	Yes 2/20/97	AT&T has agreed to implementation with straight line directory listing capabilities. AT&T and SWBT will mutually establish capabilities beyond straight-line listings outside of the implementation plan.
Partial Migration (Line/WTN vs. Account Level)	4/1/97-7/1/97T	Business Scenarios are same as full migrations. Development is in progress. <sup>2,3</sup>	Yes 2/6/97	Status is the same as migration.
New Connects				
- Single Line	2/1/97C	EDI mapping requirements received from AT&T on 1/13/97. Development of this functionality with straight line directory listings was completed on 2/1/97. SWBT is currently performing internal testing. <sup>2,3</sup>	Yes 2/20/97	Directory listing issues were closed 2/20.
- Multi-Line (Less Than 30 Lines)	2/1/97C	EDI mapping requirements received from AT&T on 1/13/97. Development of this functionality with straight line directory listings was completed on 2/1/97. SWBT is currently performing internal testing. <sup>2,3</sup>	Yes 2/20/97	Directory listing issues were closed 2/20.
- Projects (Large Job - add'l facilities/ coordinated work effort required - need SWBT criteria)	7/1/97T	Pre-order information must be requested prior to sending a firm order via EDI. Pending definition of business scenarios and subsequent changes to accommodate those scenarios. <sup>2,3</sup>	No	AT&T and SWBT agreed to negotiate these interfaces after POTS and PBX/DID trunk issues are resolved. AT&T and SWBT have agreed to mutually negotiate an implementation date for this functionality that may be beyond 6/1/97.

Disconnects	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,2</sup>	Yes 2/6/97	
Change Orders				
- Add/Disc Class Features	3/1-4/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. <sup>2,3</sup>	Yes 2/20/97	
- Simple Number Change	3/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. <sup>2,3</sup>	Yes 2/20/97	
- Add/Disc Blocking	3/1-4/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. <sup>2,3</sup>	Yes 2/20/97	
- PIC and Local PIC Change	4/1/97C	Development of the functionality for PIC Change is complete. SWBT is currently performing internal testing. <sup>2</sup> Development of Local PIC Change functionality is complete and will be made available when equal access to IntraLATA toll is implemented.	Yes 2/20/97	
- Add/Disc Essential Lines	3/1-4/1/97C	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. <sup>2,3</sup>	Yes 2/6/97	(Refer to Migration and Add/Disc Class features for Summary)
- Add/Disc Additional Lines	3/1-4/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. <sup>2,3</sup>	Yes 2/6/97	(Refer to Migration and Add/Disc Class features for Summary)
- Directory Listing Changes	4/1/97C	Development of this functionality for straight line listings is complete. SWBT ready for internal testing for straight line listings. <sup>2</sup> EDI mappings for non-straight line listings have not been defined.	Yes 2/20/97	AT&T and SWBT will mutually establish capabilities beyond straight-line listings outside of the implementation plan.
- Suspend/Restore Non-Payment	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,2</sup>	Yes 2/6/97	
- Suspend/Restore Vacation Svc.	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,2</sup>	Yes 2/6/97	
Records Only Order	4/1/97C	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,2,3</sup>	Yes 2/20/97	

T&F Order	4/1/97C	Development of this functionality is complete for T orders with a straight line directory listing. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,2,3</sup> EDI mappings for non-straight line listings have not been defined.	Yes 2/20/97	
<b>NON-POTS SERVICE ORDERS<sup>C</sup></b>				
PBX Trunks	6/1/97T	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. EDI mapping must be completed. <sup>2,3,4</sup>	No	ECCKT and TCCO field definition and business rule issues remain unresolved. Closure is expected within the next 7-10 days.
DID Trunks	6/1/97T	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. EDI mapping must be completed. <sup>2,3,4</sup>	No	ECCKT and TCCO field definition and business rule issues remain unresolved. Closure is expected within the next 7-10 days.
Plexar	7/1/97T	Functionality is not achievable by target date - SWBT continues to be concerned about the difficulties of establishing an electronic interface which would support all the numerous codes required for this unique and extremely complex order type. SWBT handles this order type with manual, customer interactive processes. These processes should be used on LSP orders as well so that quality is assured and parity is maintained. Function is pending mutual definition of business scenarios and subsequent changes to accommodate those scenarios. <sup>2,3</sup>	No	AT&T and SWBT agreed to negotiate these interfaces after POTS and PBX/DID trunk issues are resolved. AT&T and SWBT have agreed to mutually negotiate an implementation date for this functionality that may be beyond 6/1/97.

Digiline/ISDN	7/1/97T	Functionality is not achievable by target date - SWBT continues to be concerned about the difficulties of establishing an electronic interface which would support all the numerous codes required for this unique and extremely complex order type. SWBT handles this order type with manual, customer interactive processes. These processes should be used on LSP orders as well so that quality is assured and parity is maintained. Function is pending mutual definition of business scenarios and subsequent changes to accommodate those scenarios. <sup>2, 3</sup>	No	AT&T and SWBT agreed to negotiate these interfaces after POTS and PBX/DID trunk issues are resolved. AT&T and SWBT have agreed to mutually negotiate an implementation date for this functionality that may be beyond 6/1/97.
Semi-Public Phones	1/1/97C	AT&T has agreed to obtain the additional feature codes needed for this service. SWBT internal testing completed. Ready for testing by LSPs. <sup>1, 2, 3</sup>	Yes 2/6/97	
MegaLink (T1.5)	7/1/97T	Functionality is not achievable by target date - SWBT continues to be concerned about the difficulties of establishing an electronic interface which would support all the numerous codes required for this unique and extremely complex order type. SWBT handles this order type with manual, customer interactive processes. These processes should be used on LSP orders as well so that quality is assured and parity is maintained. Function is pending mutual definition of business scenarios and subsequent changes to accommodate those scenarios. <sup>2, 3</sup>	No	AT&T and SWBT agreed to negotiate these interfaces after POTS and PBX/DID trunk issues are resolved. AT&T and SWBT have agreed to mutually negotiate an implementation date for this functionality that may be beyond 6/1/97.
<b>OTHER - SERVICE ORDER COMPONENTS</b>				
Multi-Line Hunting	4/1/97C	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. <sup>2, 3, 4</sup>	Yes 2/20/97	
Preferential Hunting	3/1/97C	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. <sup>2, 3, 4</sup>	Yes 2/20/97	

Transfer of Calls - Network Intercept	1/1/97	Development of TFC functionality is complete. For Disconnect orders, SWBT internal testing is completed and SWBT is ready for testing by LSPs. <sup>1, 2, 3</sup> SWBT is currently performing internal testing for TFC functionality associated with Change and T&F orders.	Yes 2/20/97	
Toll Billing Exception (alternatively billed calls)	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1, 2, 3</sup>	Yes 2/6/97	
Handicap Services	1/1/97	Handicap services on Change orders and New Connect orders will be effective when those order types are implemented. <sup>2, 3</sup>	Yes 2/6/97	
ComCall	4/1/97C	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. <sup>2, 3, 4</sup>	Yes 2/20/97	
Future Expected Delivery Date (EDD)	4/1/97C	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. <sup>2, 4</sup>	Yes 2/20/97	
Conversion When Final Bill Address Is Foreign PO	4/1/97C	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. <sup>2, 4</sup>	Yes 2/20/97	
<b>DIRECTORY LISTINGS</b>				
Directory Listing (Straight Line)				
- White	2/1/97C	Development complete for straight line directory listings. Ready for internal SWBT testing. <sup>2</sup>	Yes 2/20/97	AT&T and SWBT will mutually establish capabilities beyond straight-line listings outside of the implementation plan.
- Yellow	N/A			N/A
Directory Listing Other Than Straight Line				
- White	2/1/97C	EDI mappings for non-straight line listings have not been defined. <sup>2</sup>	No	AT&T and SWBT will mutually establish capabilities beyond straight-line listings outside of the implementation plan.
- Yellow	N/A			N/A

Directory Order Changes Prior to Publishing				
- White	N/A		Yes 2/20/97	
- Yellow	N/A			N/A
Directory White Pages (Non-SWBT Areas)	N/A			N/A
Directory Expedite				
- White	N/A			N/A
- Yellow	N/A			N/A
<b>POST SERVICE ORDER EDI TRANSACTIONS</b>				
Supplemental Orders				
Firm Order Confirmation (FOC)	4/1/97C	Development of this functionality is complete. On 2/6/97 additional requirements were identified for Bill-on situations. Coding to accommodate these new requirements will begin once final agreement with AT&T is reached.	Yes 2/21/97	On 2/20/97 SWBT agreed to provide a single FOC/completion per order regardless of the number of lines contained within the order. AT&T has agreed to methodologies to provide SWBT a "Bill-on" indicator in an EDI field reserved for other purposes to flag multi-line orders.
Jeopardies/Missed Appointments	?	By 4/1/97, SWBT will provide missed appointment information via the EDI 855 transaction.	Yes 2/21/97 for missed appointments  No for jeopardies (the Parties have agreed to implement a manual process until this functionality is available)	This issue was resolved on 2/10/97 for missed appointments. SWBT will provide the OBF 855 transaction to AT&T in response to an AT&T generated 850 ordering transaction if a due date is missed. AT&T will negotiate a new due date with its customer and communicate the new due date to SWBT via a supplemental order (860) EDI transaction code. SWBT has agreed to accept the 860 transaction code. AT&T and SWBT will mutually work to implement a manual process for jeopardy notification.
Rejects	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1</sup>	Yes 2/14/97	This issues was closed on 2/14/97, wherein: <ul style="list-style-type: none"> <li>AT&amp;T agreed to abide by SWBT's edit structure. AT&amp;T is developing edits to correspond with SWBT's.</li> </ul>



Order Completion	1/1/97	Development of this functionality is complete. On 2/6/97 additional requirements were identified for Bill-on situations. Coding to accommodate these new requirements will begin once final agreement with AT&T is reached.	Yes 2/21/97	On 2/20/97 SWBT agreed to provide a single FOC/completion per order regardless of the number of lines contained within the order. AT&T has agreed to a methodology to provide SWBT a "Bill-on" indicator in an EDI field reserved for other purposes to flag multi-line orders.
<b>PRE-ORDER - UNE‡</b>				
Address Verification	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1</sup>	Yes Prior to 1/1/97	AT&T and SWBT have reached agreement in these areas and AT&T believes that SWBT's Datagate interface is available. AT&T and SWBT established the physical connectivity (T1.5) to be used for testing on 2/24/97. AT&T will work with SWBT to test these transactions. Full interface functionality will not be tested until ordering interfaces and functionality are available.
Services/features Availability	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1</sup>		
Telephone Number Assignment	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1</sup>		
Customer Service Record (CSR)	1/1/97C	Development of this functionality is complete for non-complex services. SWBT internal testing completed. Ready for testing by LSPs. <sup>1</sup> Complex CSR functionality will be complete by 4/15/97.	Under Analysis	

ORDERING - UNE <sup>c</sup>		<p>SWBT has developed an EDI Interface to receive Local Service Requests for Unbundled Network Elements (UNE). This interface also electronically responds to the LSP with acknowledgments (including error conditions if applicable), Firm Order Confirmations and Service Order Completion notices. Effective 1/2/97, SWBT is ready for LSP testing of this interface. SWBT's UNE EDI Interface is based on OBF/EDI national standards current with OBF definitions in final closure as of 1/2/97. This interface currently supports the ordering of the Local Loop, Local Loop with Interim Number Portability, Interim Number Portability and Switch Ports for the following activity types: new connect, disconnect, inside move, outside move, records change, and conversion to new LSP.</p> <p>As a first step towards Operational Readiness Testing, SWBT provided AT&amp;T with LSR data element definitions currently supported by SWBT's EDI Gateway for Unbundled Network Elements on 1/29/97.</p>	No	<p>AT&amp;T and SWBT have begun negotiations of the detailed issues and requirements necessary to order/provision Unbundled Network Elements individually or in combination. AT&amp;T requires comparable electronic interfaces for UNE and recommends that AT&amp;T and SWBT work cooperatively to implement electronic interfaces to support all unbundled network elements in parallel to the industry standards work of OBF as was done for Resale.</p>
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See footnotes on next page

† AT&T and SWBT are working cooperatively to implement the functionality required for the pre-ordering and ordering/provisioning interfaces by June 1, 1997 with testing capabilities available April, 1997. AT&T and SWBT are focusing on these interface availability dates in totality as opposed to the individual functionality dates in this column.

† AT&T and SWBT have differing interpretations of the Arbitration Award. Specific to pre-ordering, AT&T and SWBT are not in agreement with respect to the due date and dispatch pre-ordering functions. AT&T's position is that it is entitled to the same level of functionality for UNE as Resale and should be able to assign due dates and schedule installation dispatch appointments should a dispatch be required. SWBT plans to use UNE ordering intervals for due date assignment and believes it is not required to provide dispatch and due date functionality, which SWBT does not provide to itself today.

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**SWBT Footnotes:**

- <sup>1</sup> "Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBF/EDI standards have not been developed. SWBT believes testing should be initiated prior to full requirements completion on a mutually agreeable schedule.
- <sup>2</sup> On 2/6/97 additional requirements were mutually agreed to for Bill-on situations. Programming is currently being reworked to accommodate these new requirements.
- <sup>3</sup> SWBT and AT&T agreed on 2/6/97 to use SWBT USOC's and FIDs in lieu of incomplete national codesets. All additional features not previously mapped to feature codes will be defined by SWBT.
- <sup>4</sup> SWBT and AT&T continued discussions during the week of 2/17/97 to define scenarios and mapping.

**AT&T Footnotes:**

- <sup>A</sup> Dates in this column represent the actual date of issue closure based on the issues described in previous reports. Closure does not necessarily mean that AT&T and SWBT have completed documenting the agreements reached (e.g., joint interface agreement), defining business rules and/or completing EDI mapping.
- <sup>B</sup> AT&T's issue closure date represents the date AT&T and SWBT agreed to "what" would be done to resolve development issues. It is critical that development issues be resolved and documented prior to initiating systems coding and development. The issue resolution date will define what needs to be developed and be the determining factor for testing and implementation based on how long development will take. Specific interface and functionality testing and implementation dates will be mutually negotiated between the Parties.
- <sup>C</sup> There is an unresolved issue that must be resolved prior to implementation and resolution and will require development by one or both parties once resolved. The issue is:
  - Billing Account Number (BAN). For the wholesale bill SWBT will render to AT&T, it has limitations of \$10 million and 5,000 business/10,000 consumer accounts on each BAN bill. This must be resolved to ensure that end-user customer order provisioning is not gated or interrupted as a result of wholesale billing limitations.

**EXHIBIT ND-6**

**AT&T FEBRUARY 14, 1997 CORRESPONDENCE DECLARING  
DELIVERY OR ELECTRONIC OPERATIONAL INTERFACES  
FOR ORDERING AND PROVISIONING TO BE IN JEOPARDY**



Rian J. Wren  
Vice President  
Southwest States  
Local Services Organization

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Dallas, TX 75240  
214-778-2595  
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February 14, 1997

Mr. Stephen Carter  
Vice President, General Manager  
Southwestern Bell Telephone Company  
One Bell Center, Room 4110  
St. Louis, MO 63101

Dear Stephen;

I have reviewed Mr. Todd's letter of February 12, 1997, and my concern regarding the ability for AT&T/SWBT to deliver the electronic operational interfaces for ordering/provisioning on time has escalated to the point where I believe we are now in jeopardy. Mr. Todd's letter is unclear and evasive. The lack of clarity surrounding SWBT's positions leads us to believe that SWBT does not share AT&T's sense of urgency centered around resolving the critical implementation issues that remain unresolved.

I am requesting your personal attention and involvement in resolving the following business POTS issues as well as ensuring that the consumer implementation issues are closed by February 21, 1997, and the complex business services (PBX/DID trunks) issues are closed by February 28, 1997, as we agreed on the February 10, 1997, conference call.

Single FOC and Completion

AT&T cannot agree to relax the twenty-four hour FOC requirement. The twenty-four hour turnaround time in and of itself places AT&T at a significant disadvantage from a parity perspective in comparison to the timeframes SWBT provides the same type of information contained within the FOC to its customer service representatives. SWBT's customer service representatives have real-time access to the information contained within the EDI FOC and order completion transactions and are not required to wait 24 hours for critical information, e.g., real-time confirmation of due dates.

Through the negotiations, SWBT committed to provide a FOC and a completion for each order it receives from AT&T as described in the AT&T/SWBT Texas Interconnection Agreement in Resale Attachment 2, Paragraphs 4.3 and 4.4. Paragraph 4.3 also includes the terms and conditions associated with the 24 hour response agreement for the FOC. The OBF has approved the multiple line FOC and completion transactions and has finalized the transaction formats to support multiple lines and the corresponding relevant information. **AT&T requests that SWBT identify the date by which it will be in a position to meet the agreements as specified in our Interconnection Agreement and support the industry standards governing these transactions.**

Mr. Todd's letter describes "limitations on Resale (i.e., the inability to link the WTN to the SWB service order number and completion date/due date)". We do not understand what is meant by this statement. We are concerned that SWBT must be saying that upon receipt of an order from AT&T that contains multiple lines, SWBT will disaggregate the order into multiple orders and introduce manual processes to provision the service as ordered. It is my understanding that the Texas Commission ordered the operational date of June 1, 1997, as opposed to the earlier dates requested by AT&T in order to ensure that the need for manual processes would be eliminated. Perhaps the conclusion we have reached is not correct; if this is so, **we request your assistance in understanding what exactly is being described in Mr. Todd's letter. If, on the other hand, our understanding is accurate, we request that SWBT 1) provide AT&T with the details describing how it will process orders it receives from AT&T that contain multiple lines; 2) if there is manual processing, how and when SWBT will comply with the Commission Arbitration Award and move to a fully mechanized environment.**

#### Operating Company Numbers

We have been attempting to understand the issue surrounding SWBT's inability to accept a national OCN from AT&T for Resale since December 16, 1996, and as of this date we remain without a description of the actual issue. AT&T consulted with Bellcore regarding this issue in October, 1996, and received confirmation that in a Resale environment, state-level OCNs are not required and a national OCN is appropriate for AT&T's use when providing local service via Resale. We have confirmed that Bell Atlantic, BellSouth, Nynex, Pacific Bell, and GTE (multiple state Companies) have agreed to accept AT&T's national OCN. We recommend that as opposed to AT&T assuming the responsibility on behalf of SWBT to translate how the other RBOCs are addressing this issue, that SWBT contact its RBOC counterparts directly.

#### Jeopardies and Missed Due Dates

SWBT's response on this issue concerns me greatly with respect to our business relationship. I recall Rich Fowler pointing out during our February 10, 1997, conference call that Paragraph 4.7 in Resale Attachment 2 of the AT&T/SWBT Texas

Interconnection Agreement includes the words "when available" associated with jeopardies. Throughout our discussions surrounding this issue during the conference call and when we summarized the resolution of this item, SWBT did not advise AT&T that the resolution agreement was only for missed due dates. Be that as it may, SWBT agreed to provide the jeopardy information via the EDI interface "when available" last July through the negotiations process as codified in our Interconnection Agreement filed with the Texas PUC. **We request that SWBT define the timeframe associated with "when available".** It is our understanding from a series of test calls that we have placed to SWBT's customer care centers that SWBT does provide this level of information to its customer care centers in advance of missing a customer appointment or due date. Unless we reach an agreement with respect to how we will manage jeopardy notification, we will not have a process that is at least at parity with what SWBT provides to itself.

Mr. Todd states in his letter that SWBT believes "that further discussions are necessary to clarify the EDI "missed appointment" information". Our teams have discussed the details associated with the OBF transactions in numerous sessions and as a result, we do not know what information is still in question at this time. **Please provide me with the specific clarifications that SWBT requires in order to understand the missed due date requirements.**

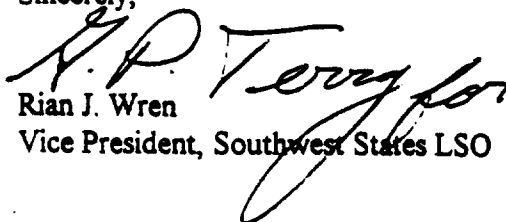
*Hard/Fatal Edits*

We understand SWBT's position regarding AT&T's request that SWBT relax its edits for an interim period of time and will work with SWBT to ensure that AT&T understands SWBT's edit structure prior to implementation. Although our teams have had discussions regarding the business rules that govern SWBT's edits, the risk exists that there may be misunderstandings regarding the rules. To that end, we will work with SWBT to conduct "robust" testing to identify any such cases prior to scheduling the end-to-end operational readiness testing with SWBT.

With implementation dates in jeopardy as a result of these issues remaining unresolved, we request your immediate attention and response to these items.

Stephen, my concerns are not only with these unresolved issues but also with the lack of clarity from SWBT with respect to open issues, definitions, etc. It is critical that our technical teams not be encumbered by ambiguity and that they clearly document agreements in order to ensure a successful implementation.

Sincerely,

  
Rian J. Wren  
Vice President, Southwest States LSO

**EXHIBIT ND-7**

**SWBT FEBRUARY 10, 1997 RESPONSE TO AT&T  
ON RESALE IMPLEMENTATION ISSUES**



Alfred W. Todd, Jr.  
General Manager  
Regional Sales

Southwestern Bell Telephone  
1010 Pine, Room 8-E-11  
St. Louis, Missouri 63101  
Phone 314 236-4443  
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February 10, 1997

Mr. Greg Terry  
Southwestern States Local  
Infrastructure & Access Management  
Vice President  
AT&T  
5501 LBJ Freeway, Suite 435  
Dallas, Texas 75240

Dear Greg,

As you know, Mr. Wren's January 28, 1997, letter confirms that AT&T wishes to utilize SWBT Residential Easy Access Sales Environment (EASE) to perform Resale pre-ordering and ordering functions. We are very pleased to offer connectivity to this system and look forward to implementing the initial plan set forth between our companies in Dallas on January 30, 1997. The EASE implementation schedule John Powell provided to Ralph Scargall requested that initial connectivity to the EASE training database occur on February 6, 1997. As our teams have established, early this week we will have everything in place to make this connection and we feel that the remaining EASE deployment schedule is achievable. However, before connectivity is established, we need to obtain AT&T's agreement and acceptance of SWBT's position regarding the rates that will apply to AT&T's requested connectivity to EASE, as well as other OSS functions as indicated in the January 30, 1997 meeting.

I suggest that we use this letter to establish your acknowledgment of the applicability of rates to access SWBT Operations Support System (OSS). Subsequently we will need to incorporate rates into our Texas Interconnection Agreement. The rates are as provided below, however, please know there are very similar rates applicable for other SWBT states:

Upon access to one or more of the SWBT OSS functions (e.g., pre-ordering, ordering / provisioning, maintenance / repair, billing) in Texas SWBT will apply a System Access charge of \$ 3,200.00 per month.

Connection to the SWBT Remote Access Facility is required for EASE, CNA, Verigate, and DataGate. Connectivity may be established in two ways, which enables access functions for SWBT's 5 state territory. The following port charge(s) applicable to the connection method (dial vs. direct) and number of ports required:

- Direct Connection (56Kbs-1.54Mbps trunk) Port \$1580.00 per port per month
- Dial Up (28Kbs modem) Port rate(s) \$ 316.00 per port per month

Mr. Terry  
February / 0 , 1997  
Page 2 of 2

Note: The data transmission capacity of these ports referenced will translate to the number of users that can be supported. This number will depend upon the system(s) utilized and combined activity level of all users. Analysis will be required.

In the provision of Usage Billable Records and Local Disconnect Report Notifications SWBT applies a charge of \$.003 per message.

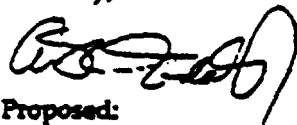
This represents SWBT's current OSS rate structure as applicable to any and all LSP access to the functions of pre-ordering, ordering, provisioning, repair / maintenance and billing. SWBT reserves the right to modify its rate structure in the future. Any custom development request will be considered on an individual case basis.

SWBT is offering a one-time, 90-day free access period to its OSS functions. The free access period begins when access is established to any function in a live mode. SWBT also offers a free 90-day evaluation period whereby SWBT software applications (e.g., CNA, EASE, etc.) and testing database are made available for evaluation and training purposes, as applicable. Note: The free access period does not apply to tariffed OSS functionality (e.g., Bill Plus™).

I apologize for the tight timeframe and informality of this request. However, I believe you will agree that we have the most important issue in place, i.e., function availability. Please acknowledge AT&T's acceptance of SWBT's position regarding the application of rates and your agreement to resolve any rate dispute prior to utilizing OSS functions in a live environment by signing below. Please fax your reply to 314-331-9402. With this acknowledgment, SWBT will continue our OSS implementation actions.

By agreeing to provide access to SWBT OSS systems at the rates described herein, SWBT does not waive any legal arguments SWBT may have as to the appropriateness thereof.

Sincerely,



Proposed:

Please Circle One:

Rates Accepted

Rates Disputed - to be resolved

\_\_\_\_\_  
SWBT

\_\_\_\_\_  
AT&T

\_\_\_\_\_  
DATE

\_\_\_\_\_  
DATE

**EXHIBIT ND-8**

**AT&T FEBRUARY 11, 1997 RESPONSE TO  
SWBT PROPOSED RATES FOR ACCESS TO SWBT OSS**

*Nancy*



5501 LBJ Freeway  
PO Box 650345  
Dallas, Texas 75265-0345

February 11, 1997

Mr. Alfred W. Todd, Jr.  
General Manager  
Regional Sales  
Southwestern Bell Telephone  
1010 Pine, Room 8-E-11  
St. Louis, Missouri 65101

Dear Al,

This letter is in reply to your February 10, 1997 letter to Greg Terry regarding the rates SWBT proposes to charge for access to SWBT Operations Support Systems (OSS).

AT&T does not dispute the applicability of an OSS charge, however we need more time to analyze the specific rates proposed in your letter. Therefore, enclosed is your February 10 letter signed by me with the section "Rates Disputed - to be resolved" circled. As stated in your letter, this acknowledgment will result in SWBT moving forward with establishing the connectivity to EASE and proceeding with other EASE implementation activities.

I am the AT&T representative responsible for resolving the OSS rate level issue for all five SWBT states. It is my understanding that I need to work with Rich Fowler to reach an agreement on OSS rates. I plan to contact Rich immediately to begin discussions on this issue. If he is not the appropriate SWBT contact on this issue, I would appreciate it if you would identify the correct contact.

If you have any questions, please call me at (972) 778-2616.

Sincerely,

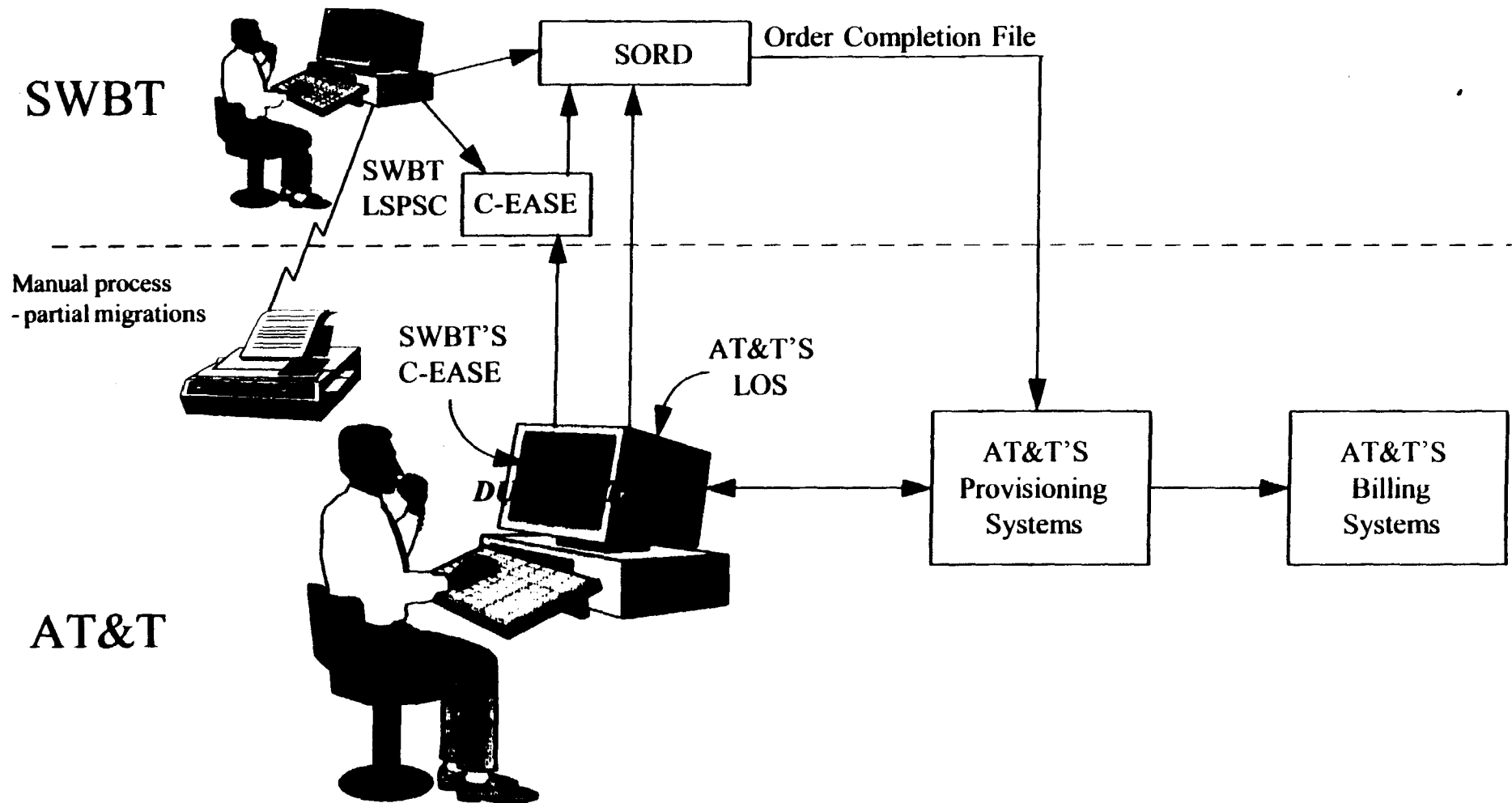
A handwritten signature in dark ink, appearing to read "Surendra Saboo".

Surendra Saboo  
Southwest Region Operations  
and Technical Planning  
Vice President

Enclosure

**EXHIBIT ND-9**  
**CONSUMER EASE**

# Consumer EASE



R. Falcone/  
S. Turner

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

APPLICATION OF ERNEST G.	§	
JOHNSON, DIRECTOR OF THE	§	
PUBLIC UTILITY DIVISION,	§	
OKLAHOMA CORPORATION	§	Cause No. PUD 970000064
COMMISSION TO EXPLORE THE	§	
REQUIREMENTS OF SECTION 271	§	
OF THE TELECOMMUNICATIONS	§	
ACT OF 1996.	§	

**STATEMENT OF ROBERT V. FALCONE  
AND STEVEN E. TURNER  
ON BEHALF OF  
AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.**

Robert V. Falcone and Steven E. Turner, being duly sworn, hereby state as follows:

**I. INTRODUCTION AND QUALIFICATIONS**

**A. Robert V. Falcone**

1. My name is Robert V. Falcone. My business address is 295 North Maple Avenue, Basking Ridge, New Jersey, 07920.

2. I am employed by AT&T as a District Manager in the Local Services Division. My current job duties include providing network technical support for new service applications.

3. I hold a B.S. in Business Administration from Adelphi University, Garden City, New York. Additionally, I have attended a number of technical and business related courses offered by the AT&T School of Business. I began my career with AT&T in 1970 working in a major switching center in New York City. I became responsible for administration of the New York City 4ESS switching complexes. I was also later responsible for routing translations in AT&T's Northeastern Region, divestiture planning and access bill verification. In 1985, I assumed responsibility for access engineering in the Northeast Region. For Unitel of Canada, I also served as project manager for the business service development organization, provided



technical support for SS7 network interconnection, and acted as network consultant. In 1995, I assumed my current position in the Local Services Division.

4. I have testified on behalf of AT&T in arbitration proceedings under the Telecommunications Act of 1996 (FTA) in several states. These proceedings include proceedings involving SWBT in the state of Texas. I also have testified in several proceedings involving other regional Bell operating companies in other parts of the country.

**B. Steven E. Turner**

5. My name is Steven E. Turner. Currently, I head my own telecommunications and financial consulting firm, Kaleo Consulting.

6. I hold a Bachelor of Science degree in Electrical Engineering from Auburn University in Auburn, Alabama. I also hold a Masters of Business Administration in Finance from Georgia State University in Atlanta, Georgia.

7. From 1986 through 1987, I was employed by General Electric in its Advanced Technologies Department as a Research Engineer developing high speed graphics simulators. I joined AT&T in 1987 and, during my career there, held a variety of engineering, operations, and management positions. These positions covered the switching, transport, and signaling disciplines within AT&T. From 1995 until 1997, I worked in the Local Infrastructure and Access Management organization within AT&T. In this organization, I gained familiarity with many of the regulatory issues surrounding AT&T's local market entry, and specifically issues regarding the unbundling of incumbent local exchange company (LEC) networks. I was on the AT&T team that negotiated with Southwestern Bell Telephone Company (SWBT) regarding unbundled network element definitions and methods of interconnection.